

EXHIBIT 55
FILED UNDER SEAL

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED)
4 STATES VIRGIN ISLANDS)

5 Plaintiff,)

6 vs.)

7 JPMORGAN CHASE BANK, N.A.,)

8 Defendant/Third-)
9 Party Plaintiff.)

10 JPMORGAN CHASE BANK, N.A.)

11 Third-Party)
12 Plaintiff,)

13 vs.)

14 JAMES EDWARD STALEY,)

15 Third-Party)
16 Defendant.)

17 FRIDAY, MAY 26, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 **CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER**

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21 Videotaped deposition of James
22 Dimon, held at the offices of JPMorgan Chase,
23 383 Madison Avenue, New York, New York,
24 commencing at 9:02 a.m. Eastern, on the above
25 date, before Carrie A. Campbell, Registered
Diplomate Reporter and Certified Realtime
Reporter.

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1 DIRECT EXAMINATION

2 QUESTIONS BY MR. SULLIVAN:

3 Q. Good morning, sir. My name is
4 Brendan Sullivan, counsel for Jes Staley, and
5 I'll begin the questioning today.

6 First off, I want you to focus
7 on the year 2006. Mr. Epstein was indicted
8 in Florida in the summer of 2006.

9 Were you informed of that
10 indictment by personnel in the bank?

11 A. I do not believe I was.

12 Q. Did you speak with Jes Staley
13 about the fact that Mr. Epstein had been
14 indicted?

15 A. I did not.

16 Q. Did you receive a report from
17 Jes Staley that he had visited with
18 Mr. Epstein the day or so after the
19 indictment?

20 A. I did not.

21 Q. Did Mr. Staley inform you what
22 Mr. Epstein said with respect to the
23 indictment which had been returned a day or
24 two before?

25 A. Nope.

1 Q. Did you speak with Mr. Staley
2 at all in the year 2006 about Mr. Epstein?

3 A. I don't recall ever having a
4 conversation with him about Jeff Epstein.

5 Q. Do you -- strike that.

6 During the year 2006, did you
7 speak at any time with Mary Erdoes about the
8 Epstein indictment and whether or not he
9 should continue as a customer of the bank?

10 A. Nope.

11 Q. During the year 2006, did you
12 speak with general counsel Steve Cutler with
13 respect to Mr. Epstein having been indicted
14 and whether he should remain a customer of
15 the bank?

16 MR. BUTTS: Objection.

17 And I'll instruct you -- you
18 may answer the question yes or no, and
19 we'll take it from there.

20 THE WITNESS: No.

21 QUESTIONS BY MR. SULLIVAN:

22 Q. Were you aware of the fact that
23 Mr. Epstein had been indicted, through any
24 source other than bank personnel, in the year
25 2006?

1 Q. And therefore -- well, did you
2 ever have a conversation with him on the
3 telephone?

4 A. No.

5 (Discussion off the record.)

6 Q. I would like to focus you, sir,
7 on the transaction known as Highbridge.

8 Do you remember what year that
9 arose?

10 A. I don't recall the specific
11 year, no.

12 Q. Well, what is Highbridge?

13 A. It was a hedge fund. A money
14 manager.

15 Q. And how was it it came to be
16 acquired by the bank?

17 A. Jes Staley was running asset
18 management, and he brought it to our
19 attention. He wanted to acquire it.

20 Q. And a decision was made to
21 acquire it?

22 A. After review, yes.

23 Q. And what was it -- did it turn
24 out to be a good decision, productive for the
25 bank?

1 A. Not really.

2 Q. Was Jeffrey Epstein involved in
3 the transaction at all?

4 A. I don't recall any involvement
5 on his part. Back then.

6 Q. Were you informed that Jeffrey
7 Epstein received a \$15 million fee for his
8 work in connection with that transaction?

9 MR. BUTTS: Again, at the time?

10 MR. SULLIVAN: Yes, at the
11 time.

12 THE WITNESS: No.

13 QUESTIONS BY MR. SULLIVAN:

14 Q. And I don't mean by -- paid by
15 the bank. Paid by --

16 A. No.

17 Q. Have you, sir, at any time
18 spoken with regulators in the UK about
19 Mr. Staley?

20 A. Regulators? I don't believe
21 so.

22 Q. Now, there came a time -- sir,
23 have you spoken to any official of Barclays
24 Bank about Jes Staley?

25 A. Yes.

1 A. I don't think Jeff Epstein ever
2 arranged for me to meet with anybody, to my
3 knowledge. And I knew Ehud Barak. We did
4 not need introductions to anybody.

5 (Dimon Exhibit 113 marked for
6 identification.)

7 QUESTIONS BY MR. BOIES:

8 Q. Let me ask you to look at a
9 document that has been previously marked as
10 Exhibit 113.

11 This is a series of e-mails.
12 The one at the bottom, January 23, 2008, at
13 12:44 p.m., says, "Hello Rosa, I think [REDACTED]
14 may have already e-mailed you, but wanted to
15 follow up just in case. Jeffrey was talking
16 to me on the phone and to [REDACTED] who was
17 standing with him at the same time, so not
18 sure which one of us was actually to e-mail
19 you. Jeffrey requested that we give you the
20 contact e-mail for Ehud Barak so that you
21 could organize the meeting with Jamie Dimon
22 and Barak on your end for simplification."

23 And then Rosa writes to Jes
24 Staley, "Jes, is it okay for me to contact
25 Ehud Barak directly to arrange a meeting with